IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

In re) Chapter 11
TELEGLOBE COMMUNICATIONS CORPORATION, et al.,) Jointly Administered) Bankr. Case No. 02-11518 (MFW)
Debtors.)
TELEGLOBE COMMUNICATIONS CORPORATION, et al.,)) FILED UNDER SEAL
Plaintiffs,)
V.) C.A. No. 04-CV-1266 (SLR)
BCE INC., et al.,)
Defendants.)

PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Gregory V. Varallo (No. 2242) C. Malcolm Cochran, IV (No. 2337) Russell C. Silberglied (No. 3462) Chad M. Shandler (No. 3796) Anne Shea Gaza (No. 4093) varallo@rlf.com cochran@rlf.com silberglied@rlf.com shandler@rlf.com gaza@rlf.com Richards, Layton & Finger P.A. One Rodney Square Wilmington, Delaware 19810 Telephone: (302) 651-7700 Facsimile: (302) 651-7701 Attorneys for Teleglobe Communications Corporation, et al.

Kevin A. Gross (No. 209)
Joseph A. Rosenthal (No. 234)
kgross@rmgglaw.com
rmgg@rmgglaw.com
Rosenthal, Monhait, Gross & Goddess, P.A.
1401 Mellon Bank Center
P.O. Box 1070
Wilmington, Delaware 19801
Telephone: (302) 656-4433
Facsimile: (302) 658-7567

-and-

John P. Amato
Mark S. Indelicato
Zachary G. Newman
Jeffrey L. Schwartz
Robert J. Malatak
Hahn & Hessen LLP
488 Madison Avenue
New York, New York 10022
Telephone: (212) 478-7200

Facsimile: (212) 478-7400

Attorneys for Official Committee of Unsecured

Creditors of Teleglobe Communications

Corporation, et al.